

WWR# 9821697

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS (CHICAGO)

In Re:

James R. Smith, Jr. and Cheryl L. Smith,

Debtor(s),

Case No. 07-16279

Chapter 13

Hon. Janet S. Baer

**GUARDIAN CREDIT UNION AS ASSIGNEE OF CENTRAL STATES MORTGAGE
COMPANY'S RESPONSE TO TRUSTEE'S NOTICE OF FINAL CURE PAYMENT**

NOW COMES Guardian Credit Union as assignee of Central States Mortgage Company pursuant Fed. Bankr. R. 3001(g) and disagrees with the Trustee's Notice as follows:

1. Respondent states that any pre-petition arrearage has been cured.
2. Respondent further states that the post-petition ongoing payments are not current.

The amount past due is \$5,880.60. This Response and the itemized statement attached serve as a Supplement to Respondent's Proof of Claim.

THEREFORE, Guardian Credit Union as assignee of Central States Mortgage Company does not agree that the plan is complete.

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

Date: October 26, 2012

By: /s. Monette Cope

Monette Cope (ARDC# 6198913)

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Attorney for Creditor,

Guardian Credit Union as assignee of Central States
Mortgage Company

PROOF OF SERVICE

Creditor, Guardian Credit Union as assignee of Central States Mortgage Company, filed its Response to Trustee's Notice of Final Cure Payment. All parties were served a copy of the Response on October 26, 2012. The Response was served upon Debtor(s) by depositing the same in the U.S. Mail at 180 N. LaSalle St., Chicago, Illinois, postage prepaid and addressed as below. The remaining parties were served by the Court's CM/ECF electronic noticing.

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Cheryl L. Smith
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Chapter 13 Trustee
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Patrick S Layng, U.S. Trustee
Office of the U.S. Trustee, Region 11
219 S Dearborn St., Room 873
Chicago, IL 60604

Respectfully submitted,

WELTMAN, WEINBERG & REIS CO., L.P.A.

Dated: October 26, 2012

By: /s/ Audrey McClain
Audrey McClain, Legal Assistant